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**FIRST AMENDED PETITION – TEXAS LAW ONLY**

Kortrijk Miles, Pro Se Plaintiff

Case No. 3:25-cv-01355-E

In the United States District Court for the Northern District of Texas

Plaintiff Kortrijk Miles respectfully files this First Amended Petition to clarify that all claims in this action are brought solely under Texas law. This amended petition removes any references to federal law, including the Fair Labor Standards Act (FLSA), and asserts claims exclusively under the Texas Labor Code and the Texas Civil Practice & Remedies Code. This case is properly heard in state court.

**FACTUAL BACKGROUND**

Plaintiff was employed by Defendant LSG Sky Chefs Inc. and performed duties far exceeding the scope of the job title assigned. Despite functioning as an inventory manager responsible for customs compliance paperwork, bonded inventory, and international audit coordination, Plaintiff was underpaid and misclassified. Plaintiff was subsequently retaliated against after filing internal complaints and submitting medical leave documentation, which was ignored prior to Plaintiff's termination.

**CAUSES OF ACTION UNDER TEXAS LAW**

1. Wage Underpayment and Misclassification – Texas Labor Code § 61.014 and § 61.018
2. Retaliation – Texas Labor Code § 21.055
3. Medical Leave Violation – Common Law and Workplace Policy Protections
4. Emotional Distress and Public Embarrassment – Texas Tort Law
5. Punitive and Exemplary Damages – Texas Civil Practice & Remedies Code §§ 41.003 and 41.008

**DAMAGES REQUESTED**

Plaintiff seeks the following relief:

- Backpay: \$122,875.00
- Wage Penalty/Compensation Adjustment: \$122,875.00
- Wrongful Termination: \$400,000.00

- Retaliation (court-related firing): \$200,000.00
- Medical Leave Violation: \$150,000.00
- Emotional Distress: \$125,000.00
- Exemplary (Punitive) Damages: \$500,000.00
- Lost Benefits & Career Reentry Support: \$30,000.00
- Front Pay (3 years): \$262,080.00

**PRAYER FOR RELIEF**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this Court remand this case to the 191st Judicial District Court of Dallas County, Texas, and grant all relief to which Plaintiff is entitled under Texas law, including actual damages, exemplary damages, equitable relief, and court costs.

Respectfully submitted,

/s/ Kortrijk Miles  
Kortrijk Miles  
kortmile@gmail.com  
Dallas, Texas

## **Retaliation & Court Update Timeline - Kortrijk Miles**

**December 22, 2023**

Misclassified and underpaid as a Senior Clerk, performing Inventory Supervisor duties.

**Late 2023 - Early 2024**

Employer changed your title to 'Duty-Free Coordinator' without pay adjustment, clear duties, or explanation. Forced to sign within 3 days. No salary adjustment and still expected to clock in/out like an hourly worker.

**April 21, 2025**

Filed official claim with the court for wage misclassification, underpayment, and retaliation.

**MAY 7<sup>TH</sup> 11:40pm (Vivian)** "Why do yo have blue hairnet on you're a clerk"

**1:00** When I asked for duty free form I signed (Vivian) "what are you trying to do Miles"

**May 15, 2025**

Obtained doctor's note diagnosing workplace stress and insomnia related to retaliation. Doctor prescribed medication and excused you from work from May 19-21.

**May 16, 2025**

Emailed HR and manager at 4:49 PM with medical documentation. No response received.

**May 17, 2025**

Followed up via text at 7:49 AM. Still ignored.

**May 17-18, 2025**

Filed Supplemental Declaration with court showing employer ignored medical note and continued retaliation.

May 18, 2025, just three days before my scheduled final court hearing, I was terminated in a retaliatory action by LSG Sky Chefs. This action occurred shortly after I had formally updated the court with an amended damages request on May 16, 2025. Despite having a medical excuse on file from my physician due to work-related stress and retaliation, the company proceeded with my termination anyway.

I was escorted out of the building by police in full view of coworkers and staff, an excessive and humiliating measure taken without prior written notice or due process. I was not given a termination letter or explanation at the time, and my badge was taken from me immediately. This public display further added to the emotional and professional damage I have endured throughout this retaliation campaign. This incident reflects continued and

escalating retaliation in direct response to my protected legal activity, my formal filings, and my request for fair classification, medical leave, and damages.